

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

UNITED STATES DISTRICT COURT

for the

District of Maryland

Division

2017 JUN 27 PM 2:16

CLERK'S OFFICE
AT BALTIMOREBY SAH DEPUTY

Case No.

GLR 17 CV 1771

(to be filled in by the Clerk's Office)

Khalilah Johnson

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

United Parcel Service, Inc. (UPS)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Khalilah D. Johnson
Street Address	905 Beaverbank circle
City and County	Towson
State and Zip Code	Maryland 21286
Telephone Number	443-977-2922
E-mail Address	Khalilahhunter@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	United Parcel Service,Inc.(UPS)
Job or Title <i>(if known)</i>	
Street Address	55 Glenlake Parkway
City and County	Atlanta-Fulton County
State and Zip Code	Georgia
Telephone Number	410-455-8213
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	United Parcel Service, Inc.(UPS)
Street Address	3901 Vero rd
City and County	Baltimore-Baltimore City
State and Zip Code	Maryland 21227
Telephone Number	410-455-8213

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Other federal law *(specify the federal law)*:

- ☐ Relevant state law *(specify, if known)*:

- ☐ Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts *(specify)*: _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
4/29/2015 and continuos ,see attached timeline.

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race _____
- ☐ color _____
- ☐ gender/sex _____
- ☒ religion Sabbath Keeping Christian
- ☐ national origin _____
- ☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
- ☒ disability or perceived disability *(specify disability)*
Injured shoulder.back and neck

E. The facts of my case are as follows. Attach additional pages if needed.

I have been employed by UPS since 5/2008. In 3/26/14 I sustained an injury to my shoulder and back and I was out until 4/29/15 by doctors orders. On returning to work I was made to work past my Sabbath and threatened that I would be fired if I didn't, although a religious accomadation has been on file since 10/2013. The truck was continuously unsafely overloaded with packages weighing over 100 lbs even though I am only required to lift 70 lbs without help. I was injured on 6/1/15 and 7/30/15 which were wrongly disputed resulting in being out of work without compensation for an additional injury caused on 7/30/15 caused by 4 106 lb packages falling out of the truck. I believe the retaliation is due to having filed complaints against Ups. Please see attached timeline for specific dates and brief description of incidents.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

6/12/15

- B. The Equal Employment Opportunity Commission *(check one)*:

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on *(date)* 4/2/2017 .

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am asking the court to award damages totaling \$1.5 million for monetary and economic harm, compensation for the harm to my personal and professional reputation, my mental anguish, physical and emotional pain and suffering and all legal fees as well as any punitive damages the court determines.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6/27/2017

Signature of Plaintiff

Printed Name of Plaintiff

Khailan Johnson
Khailan D. Johnson

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Khalilah Johnson
905 Beaverbank circle
Towson, Md. 21286

2017 JUN 27 PM 2:16 06/27/17
CLERK
AT BALTIMORE
BY SAH DEPUTY

Continuous Complaint

4/29/15 Returned to work after injury to neck shoulder and arm. When I returned Supervisor Tray and Manger Gary refused me 8hrs of work. Sent me home early.

5/1/15 Went out on route with Supervisor Tom and told that the rumor was I had a lawsuit against the company and he wanted to know why.

5/5/15 Trained on my new bided route by Sup Tony. We worked side by side and had approximately 91 stops and we still clocked out at approx. 8:30 pm. After working since 8:45 that morning.

5/6/15 Toni had the dispatcher take off work and a heavy pick up. The stop count was decreased to 75 stops and we still both worked hand and hand to get it done.

5/7/15 sent out on my own with over 100 stops and all the pickups. I asked for help and Tom didn't come to assist me until almost 9 pm when he took the remaining stops so that I could take in my pick up priorities. Increased stop count by 30. The max is stated to be 80 and 70 at the least but the numbers are wrong and not contractual. Others male drivers have stated that on average they get 70 to 80 stops only and reduction in pickups.

5/12/15 sent out extremely heavy again

5/13/15 Complained to Tony and Tom Supervisors that they had too much work on the truck Tony said why you can't do it. I reminded him that he or I could do less work so why did he expect more from me. Tom said we aren't taking any work off of you. I told that the contract stated that we are to run 15 stops an hour and I am to take a lunch break my pickups start at 3 pm and end at 6:30 it takes 25 mins. to get back to the building and my priorities are to be run from 9

until 10:30 so I should have stops that total 15 an hour from 10:30 am to 2 pm. They refused to take off work and after I left union employee admitted to I and two other employees that a supervisor said that they are going to fire me for complaining.

5/14/15 I was sent out even heavier than the day before again with over 100 packages. The truck was so full that preload couldn't shut the back door. It took a preloaded and Supervisor to shove the work in my truck to close the door. See video. I told Tom and every supervisor around me. Throughout the day I sent messages that I needed help. Tom sent messages and stated no help was available and not to start my pickups until I had attempted all the business. I missed several pickups because of it I got off after 9:30pm.

5/15/15 Tom then calls me in to the office with Shop Stuart Nick Hart and tells me since I missed pick up I was getting a warning letter. I showed him the pictures of the messages he sent me showing that is what he instructed and the manager that was from corporate who I have never seen before and have not seen again said he would not give any discipline today. After I left I noticed I was lighter but still wouldn't make my Sabbath. I reminded Tom and sent messages through the board that my Sabbath was starting and I needed work taken off in order to get off before sunset. A supervisor came and got 13 of my driver release packages and said someone was coming back. Tom called me and said he talked with John Punte the Labor Manager and he said I signed a paper that only accommodates me 6 months out of the year so if I don't continue to work I will be terminated. I told Tom to put it in writing and advised him that was against policy and I will not work past my Sabbath. He continued to call me then I received messages from Tray saying I was being instructed to continue to work. My truck door broke and I was told to take the work and put it on the new truck that I received at 8 pm and sunset was at 8:21pm. When I got back in the building I brought back 25 stops and Tray and Tom were standing by the door with a shop Stuart Janet and Tray Sup says it is time to deal with my consequences I got back after my . Sabbath had started and I told him that I don't discuss business after my Sabbath he stated that if it was business hours at Ups we will discuss business. I told him that I was leaving and if they were going to fire me they had to do it when I returned. I also had several over 100 lb.

packages with no help every day I have let management know that over 70lb packages don't belong on the truck unless assistance was going to meet me but they never do.

5/19/15 I called the corporate office and made a complaint. I was out for 2 days for bereavement.

5/20/15 Returned to work and saw that I was scheduled off and a white male driver Sean Goody was to run my route truck had visible room to walk in. Pictures available. I was called in the office by Gary manager and he asked for my grandmother's obituary and said I could go home.

5/21/15 filed grievance about 5/15/15

5/28/15 I told my Manager Gary that they were dispatching and loading several over 100 lb. packages on me and no one ever came to help. He stated that the contract stated that I could handle 150 lb. package I told him that the contract stated over 70lb packages I could request help. He told me not to get the contract and sent no help for packages

5/29/15 I was doing my end of day routine and emptying my truck when Tom supervisor tells me to stop what I was doing to look at what the system showed me backing up and operating the dial board while driving and he wanted me to sign some paperwork. I told him I didn't have my reading glasses and I would like to have a shop[Stuart available to sign so I know what I was signing he said no one is around and if I didn't I was going to be disciplined on Monday. I told him I needed to concentrate on my end of day routine so I didn't make any mistakes and I was off on tie for my Sabbath he kept getting in front of me telling me to stop what I was doing and I had several minutes before my Sabbath started . I asked again that we continue on Monday when a shop Stuart was available.

6/1/15 after several days of complaining to management that contractually I did not have to handle over 70 lb. packages and because of my previous injury I felt it was dangerous that they continued to violate my right not to handle over 70 lb. packages alone. I told him that this was unsafe and I felt that I didn't want to get hurt again. He Told me to come in the office and he got the shop steward from Catonsville our Human resources Nicole Maceys husband. Jason

Swartz and said that because I refused to sign on Friday I was getting a 1 day suspension. I asked Jason was he able to force me to sign without a shop steward and was he able to give me suspension he said no but grieve it. I know it was because I complained. My truck was packed as and out one the route the oversized wheel chairs where stuck on the door and I could not get it open. I called Tom he sent tony Freeman to help open the stuck door I was instructed by Tom to keep trying to get it open until Tony came in which I did. After Tony got the door unstuck while delivering packages weighing 50 lbs. each my arm felt a sharp pain and I could not hold weight. I sprained my rotator cuff that day. I am still out my workers comp has been denied with no explanation.

6/3/15 Returned to work with a light duty note and Gary told me that he would not honor my note. I told him that that was against my rights and everyone else always uses light duty. He said he doesn't have to offer it to me. I told him I would file a complaint after all the drivers left he called me on the phone and told me I could come back. I worked for 4 hours while there Tray sup told me I had to sign some paperwork. He had me sign an observation that stated that he observed me loading and lifting incorrectly and had several safety violations. I asked him why did it state that when he wasn't observing me he said that is not what that means. I signed no observation given k Johnson for fear of being given more disciplinary action.

6/9/15 I was called in office by senior H.R. Kevin Garvey. I asked for a shop steward and was told by Kevin Garvey I didn't need one. He had in attendance our local H.R Matt and Gary Manager. He started off saying he wanted to discuss my complaints. he told me that he talked to Gary and Gary didn't do what I said . I said Mr. Garvey he said it's Kevin to you I said excuse me he said it is against company policy to call him by his last name. He then says how is that you thinks your religious rights are being violated I said that it is he said what did you sign I stated that it was against U.P.S. policy to not accommodate my Sabbath he stated he didn't asked me about policy he asked me what did I sign . He continues to tells me so that is not a violation as he was just going to move on from there. He then says tell me about the other complaint I tell him about me having over 100 lb. packages with no help and Gary telling me that he can up 150 lb. packages on me he states are you saying we can't I tell him I know about our trucks being loaded up to 150 but it doesn't mean that we are

to handle them alone. Gary says he didn't tell me that I tell him you said in front of everyone. Kevin says what are the names, I tell him I don't know the names. He tells Matt to right down that I am being uncooperative so he can just dismiss these complaints for noncompliance. He continued to be aggressively rude and dismissive he tells me that whenever I call the corporate number he is the one that investigates it. I tell him I will be calling again. I called and reported him.

6/12/15 Went to EEOC and filed complaint. I have my original report.

6/17/15 I was called in the office by Gary with shop steward Nick Hart and told that Liberty Mutual denied my workers comp claim and I needed to go home or get my doctor to send me back full duty but he wasn't going to honor my light duty anymore.

7/21/15 I returned to work full duty still workers comp being denied. Gary I told me was going out without a safety ride. Every time you are out on injury you are supposed to have a safety ride. I looked at the contract then because I was looking at the contract 1 minute after start time I was called in the office by Gary and John Pinnock and Mr. Pinnock told me I always have issues. He continued to tell me what is going to take for me to stop crying wolf. I asked why he was accusing me. He kept me in the office with shop Stuart Nick Hart . He told me that because I was on the clock looking at my contract he could give me discipline. He kept me in the office for 40 minutes and I told him I would have late airs he said he doesn't care. I was out late again that evening. He

7/22/15 I was called in the office by Charlie because I had one headset in my ear for 30 seconds after start time when the meeting began and he said I was not supposed to have it in so he was giving me a suspension. At 9 am my truck was still unloaded where I couldn't leave out of the building. The truck was loaded with heavy hazmat's on the top shelf which also caused a spill. The packages should have been loaded on the top shelf. They sent a driver out at 4:30 to bring me more packages. Then at 4:44 Charlie brought me next day airs that were supposed to be delivered by 10:30 am and followed me while I retraced my business even though I had pickups scheduled.

7/23/15 Packages were thrown on the truck where I could not get through.

7/29/15 I took photos of the condition of the trucks loaded around and beside me even the ones that were in the same area and their trucks you could walk through. Oversized packages over 100 lbs. were inside although I asked for help or for them not to load them on truck as per our contract over 70 lbs. packages we are to get assistance.

- 1.) The truck was loaded with 4 106 lbs. packages on top of boxes with several large boxes loosely stacked on top of each other. On 7/30/15 I was running my bid route 52c. I went to first delivery stop at the loading dock of 2520 Lord Baltimore. I attempted to open the back door of the truck. It would not open so after I continued with all my might to open, and eventually I got it to open but it felt like something was stuck in the door so I still struggled to get it unstuck. When I got it all the way up the packages immediately came rushing out at me I held them back and it took all my strength. I eventually got the top of the door down enough to hold back most of the weight and then I attempted to push it back in to get door closed. The dock employee by the name of Shane witnessed it. The packages should not have been loaded on the truck without assistance and it should have been laid on the floor. I was hurt and have not been to work yet. I am now permanently with restrictions of 10 lbs. and I am always in pain. I was only released to light duty by UPS refused saying I wasn't injured on the job. They have in their reports that they weren't notified until 11/02/15 when they were told immediately. They came and got me and took me to Cosentra. Ups attempted to act like I wasn't injured even sending you in the first reply that I was on leave and not injury. I applied for short term benefits through my union and was initially denied because Ups was reporting hours for me as if I was still working and I got my w2's that state they reported over 11,000 for me when I was not working all.

11/3/15 I had a deposition scheduled with Ups for the federal case I have with Ups and on the same day is when Ups requested a postponement after consideration say they only found out 11/2/15. I was without treatment and benefits.

They continued to postpone the case as my doctor recommended physical therapy and MRI. Before I returned to work.

5/3/16 The case was heard and Ups's attorney brought in supervisors that stated that I was about to be fired the same day I had the injury. Also, that I lied on my deposition about recording people without them knowing. He also brought up the dllr reported extra income for me in which Ups falsely reported so I would be able to pay for my deposition as well to hide that they injured me with overweight packages.

I am without benefits, medical treatment and unable to work. I have video, photos, transcripts, medical records, grievances, and other supporting documents to prove my claim. My husband Michael W. Johnson who is now the sole provider working for the company for over 27 years has

been threatened with firing and made to defend his job out of town over 15 times during me filing a complaint against the company, over worked, and harassed. I believe the company's intent was to force me out of my job by intentionally injuring me.

Sincerely,

Khalilah Johnson

443-977-2922

A handwritten signature in cursive script that reads "Khalilah Johnson". The signature is written in dark ink and is positioned below the printed name and phone number.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Khalilah Johnson**
905 Beaver Bank Circle
Towson, MD 21286

From: **Baltimore Field Office**
10 South Howard St
3rd Floor
Baltimore, MD 21201



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

531-2015-01630

Janel S. Griffin,
Investigator

(410) 209-2228**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

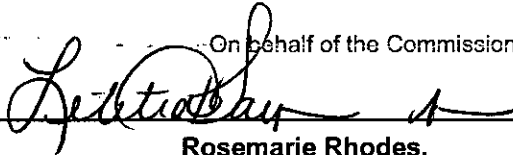
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Rosemarie Rhodes,
Director

MAR 29 2017

(Date Mailed)

Enclosures(s)

cc:

Teri Plummer McClure
Chief Legal Officer and Senior Vice President
Human Resource
UNITED PARCEL SERVICE
55 Glenlake Parkway, NE
Atlanta, GA 30328

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> Amended 531-2015-01630 </div> </div>	
Maryland Commission on Civil Rights and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Ms. Khalilah Johnson		Home Phone (Incl. Area Code) (443) 977-2922	Date of Birth 1978
Street Address City, State and ZIP Code 905 Beaver Bank Circle, Towson, MD 21286			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name UPS		No. Employees, Members 500 or More	Phone No. (Include Area Code) (410) 455-8273
Street Address City, State and ZIP Code 3901 Vero Road, Baltimore, MD 21227			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap;"> <div style="margin-right: 10px;"><input type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div><input type="checkbox"/> OTHER (Specify)</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div> Earliest 05-07-2015 </div> <div> Latest 05-03-2016 </div> </div> <div style="text-align: center; margin-top: 10px;"> <input checked="" type="checkbox"/> CONTINUING ACTION </div>	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)). <p>I. I began my employment with the above referenced employer on June 2, 2008. My current position is delivery driver. As of April 29, 2015 and continuing, I have been subjected to unequal terms and conditions of employment compared to my male counterparts. The unequal treatment has taken the form of additional route stops and packages being placed on me. When I complain about the unequal treatment from upper management, I am faced with unequal treatment in the form of having my work sabotaged, suspensions, written counseling's and threats of termination.</p> <p>II. I have not been given a reasonable explanation for the Employer's treatment towards me.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
_____ Date Charging Party Signature			

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐

FEPA

Amended☒

EEOC

531-2015-01630**Maryland Commission on Civil Rights**

and EEOC

State or local Agency, if any

III. I believe I have been subjected to unequal terms and conditions of employment and disciplined because of my sex (female), religion (Seventh Day Adventist), and in retaliation for engaging in a protected activity in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Date

Charging Party Signature

NOTARY – *When necessary for State and Local Agency Requirements*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)